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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ASHLY RAI, individually,
16 Plaintiff,

17 Case No. 2:24-cv-00161-JAD-EJY

18 v.
19 COSTCO WHOLESALE CORPORATION, a
20 Foreign Corporation, DOES I through X,
21 inclusive; and ROE CORPORATIONS I
22 through X, inclusive,
23 Defendants.

24 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (FIFTH
REQUEST)**

25 Defendant, COSTCO WHOLESALE CORPORATION (Defendant), by and through
26 their attorneys of record, GEORGE M. RANALLI, ESQ. and MAEGUN C. MOOSO, ESQ. of
27 the law firm RANALLI ZANIEL FOWLER & MORAN, LLC, and Plaintiff, ASHLY RAI
28 (Plaintiff), by and through her attorneys of record SRILATA SHAH, ESQ. of PAUL PADDA
29 LAW, PLLC to hereby request this Honorable Court to extend the deadlines as requested herein.

30 **I. LOCAL RULE 6-1 IS SATISFIED**

31 This is the fifth request for an extension of discovery deadlines filed by the parties. This

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1 Stipulation and request for extension of discovery dates is made more than twenty-one (21) days
 2 before the expiration of the deadline for discovery in this case, which is currently April 4, 2025.

3 Pursuant to the controlling Discovery Plan, the following dates govern for purposes of
 4 discovery:

5 1. Discovery Cutoff Date:	April 4, 2025
6 2. Initial Expert Disclosure:	Passed.
7 3. Rebuttal Expert Disclosure:	March 3, 2025
8 4. Dispositive Motions:	May 5, 2025
9 5. Joint Pre-Trial Order:	June 3, 2025

10 The parties have been working diligently in trying to resolve this matter and proceeded
 11 to a mediation in December of 2024, which unfortunately did not result in resolution. The
 12 parties are still tentatively discussing possible resolution of this matter, but have decided to
 13 proceed with certain needed depositions of Defendant FRCP 30(b)(6) witnesses, Plaintiff
 14 treating doctors and lay witnesses, and expert witnesses of both parties in the interim. The
 15 parties are also attempting to resolve discovery dispute issues concerning discovery responses
 16 and FRCP 30(b)(6) topics, which may necessitate motion practice if the parties are unable to
 17 reach an agreement. The parties therefore are requesting an extension of sixty (60) days to
 18 present open deadlines within which to undergo these depositions (and ideally continue
 19 settlement negotiation discussions, which these aforementioned depositions may assist in
 20 facilitating); and resolve potential discovery disputes or otherwise prepare and file the necessary
 21 motions before the Court on those issues.

22 Based on the foregoing, the parties have agreed to the extension.

23 The instant request comports with Local Rule 6-1, in that no request is made after the
 24 expiration of the specified period.

25 **II. THE FOLLOWING DISCOVERY HAS BEEN COMPLETED**

- 26 1. Plaintiff's Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
- 27 2. Plaintiff's First Supplement to Initial List of Witnesses and Documents Pursuant to
 28 FRCP 26(a);

29 . . .

- 1 3. Plaintiff's Second Supplement to Initial List of Witnesses and Documents Pursuant to
- 2 FRCP 26(a);
- 3 4. Plaintiff's Third Supplement to Initial List of Witnesses and Documents Pursuant to
- 4 FRCP 26(a);
- 5 5. Defendant's Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
- 6 6. Defendant's First Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 7 26(f);
- 8 7. Defendant's Second Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 9 FRCP 26(f);
- 10 8. Defendant's First Set of Requests for Admissions to Plaintiff;
- 11 9. Plaintiff's Responses to Defendant's First Set of Request for Admissions;
- 12 10. Defendant's First Set of Requests for Interrogatories to Plaintiff;
- 13 11. Plaintiff's Responses to Defendant's First Set of Interrogatories;
- 14 12. Defendant's First Set of Requests for Production of Documents to Plaintiff;
- 15 13. Plaintiff's Responses to Defendant's First Set of Request for Documents;
- 16 14. Plaintiff's Interrogatories to Defendant;
- 17 15. Defendant's Responses to Plaintiff's Interrogatories;
- 18 16. Plaintiff's Requests for Production of Documents to Defendant;
- 19 17. Defendant's Responses to Plaintiff's Requests for Production of Documents;
- 20 18. Deposition of Plaintiff;

Under Local Rule 26-3(d), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting only the expert and rebuttal deadline be extended.

The following deadlines are requested.

1. Discovery Cutoff Date:	June 03, 2025
2. Initial Expert Disclosure:	CLOSED
3. Rebuttal Expert Disclosure:	April 05, 2025
4. Dispositive Motions:	July 03, 2025

